

October 14, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554



RE: Notice of Ex Parte –
Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Board on Universal Service, CC Docket No. 96-45; Rules and Regulations Implementing the Truth in Caller ID Act of 2009, WC Docket No. 11-39

Dear Ms. Dortch:

On October 12, 2011 Patricia Stewart of Ironton Telephone Company, Trey Judy of Hargray Communications, Darby McCarty of Smithville Telephone Company, Inc, Craig Smith of MGW Communications, and Jerry Weikle of Weikle & Co met with John Healy of the Public Safety and Homeland Security Bureau, Chris Killion and Margaret Dailey of the Enforcement Bureau, and Richard Hovey, William Dever, Al Lewis, and Randy Clarke of the Wireline Competition Bureau.

In addition to discussing the information on the attachment, there was discussion about customer complaints filed with regulatory agencies against ERTA members over instances where calls that originated in other areas of the country were not terminated to the rural areas served by ERTA members through no fault of their own. ERTA discussed the role of least cost routers and how manual overrides to translations and routing tables made to address specific customer complaints are erased during automatic resets.

ERTA also discussed some long distance traffic aggregators that appear to terminate all calls to rural areas and not be the subject of customer complaints and others that are more associated with complaints.

If there are any questions, I can be reached at 704.782.7738.

Sincerely,

/s/ Jerry Weikle

Jerry Weikle
Regulatory Consultant

cc: John Healy
Richard Hovey
William Dever
Chris Killion
Al Lewis
Margaret Dailey
Randy Clarke



Call Termination Problems and its Impact on Consumers in Rural America

The Eastern Rural Telecom Association (“ERTA”) is a membership organization made up of community based local exchange companies (“LECs”) and support companies that provide telecommunications services to rural customers in the Eastern half of America. Besides providing local, long distance, and broadband Internet services, some ERTA members also provide wireless and cable television services. ERTA members play a role in sustaining the communities served.

The relatively new and widespread pattern of calls not being completed to customers in higher cost rural areas is discriminatory, has a negative impact on commerce, and has potential life threatening results.

ERTA believes that persons with disabilities in Rural America that are not able to receive calls or make calls to other Rural areas are discriminated against and suffer. Part 6 of the Commission’s Rules require Persons with Disabilities to have access to Telecommunications Services (which should include calls that terminate in Rural areas).

ERTA believes the FCC has existing authority to take action against companies that do not allow calls to terminate to Rural consumers.

ERTA believes that the failure to terminate calls to Rural America is a reduction and impairment of service.